



333 EARLE OVINGTON BOULEVARD, SUITE 402
 UNIONDALE, NEW YORK 11553
 T: 516-203-7600
 F: 516-282-7878

November 19, 2024

Via ECF

Hon. P. Kevin Castel
 U.S. District Court
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Re: William Farrington v. Telelatina LTD.
 Case No: 1:24-cv-05483-PKC

*November 22 conference
 adjourned to
 December 13, 2024 at 11:00 a.m.
 SO ORDERED
 J. M. [Signature] JSDJ
 11-20-24*

Dear Judge Castel:

This firm represents plaintiff William Farrington ("*Plaintiff*") in the above-referenced matter and writes pursuant to Rule 1.C. of the Court's Individual Practices to respectfully request a three-week adjournment of the November 22, 2024, Initial Pretrial Conference, along with the associated filing deadline(s). [Dkt. No. 14].

1. The current date for the Initial Pretrial Conference is November 22, 2024. [Dkt. No. 14]. The undersigned acknowledges that the filing deadline for the joint letter has past and states that said missed deadline is the result of a clerical oversight with calendaring. Counsel apologizes for the clerical oversight and subsequent missed filing deadline and respectfully submits that the Court's Orders and filing deadlines are taken very seriously.
2. Plaintiff requests a three-week adjournment of the Initial Pretrial Conference, to December 13, 2024, and extension of time for the associated filing deadline(s), which will permit the parties time to discuss the contents of the joint letter and case management plan and to continue their communications relating to settlement.
3. This is the third request for an adjournment of the Initial Pretrial Conference and all prior requests were granted. [Dkt. Nos. 11 and 13].
4. As of the date of this filing, the undersigned was unable to confirm with counsel for defendant Telelatina LTD ("*Defendant*") as to whether Defendant consents to the requested relief. However, to avoid any further delay, in light of the upcoming conference and the past filing deadline, Plaintiff is proceeding to file this request without the consent of Defendant. The undersigned has sent emails to defense counsel's known email address and has also attempted to contact defense counsel via telephone. The undersigned will continue



to attempt to contact counsel and will update the Court accordingly in the event that contact is made.

5. This request is being made in good faith, not for purposes of delay, and granting this request will not prejudice any party in this matter.

Thank you for your consideration of this request.

Respectfully submitted,

SANDERS LAW GROUP

/s/ Jaymie Sabilia-Heffert
Jaymie Sabilia-Heffert, Esq.

cc: All counsel of record via ECF